

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 Sophia S. Lau, Esq., Nevada Bar No. 13365
4 *slau@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & McRAE LLP
7 8716 Spanish Ridge Avenue, Suite 105
8 Las Vegas, Nevada 89148
9 Telephone: (702) 331-7593
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, Nevada Bar Number 12277
12 *ksinclair@sinclairbraun.com*
13 SINCLAIR BRAUN LLP
14 16501 Ventura Boulevard, Suite 400
15 Encino, California 91436
16 Telephone: (213) 429-6100
17 Facsimile: (213) 429-6101

18 Attorneys for Defendant
19 CHICAGO TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

22 Gary L. Compton, State Bar No. 1652
23 2950 E. Flamingo Road, Suite L
24 Las Vegas, Nevada 89121

25 **UNITED STATES DISTRICT COURT**
26 **DISTRICT OF NEVADA**

27 U.S. BANK NATIONAL ASSOCIATION,
28 AS TRUSTEE FOR GSR MORTGAGE
29 LOAN TRUST 2006-4F, MORTGAGE
30 PASS-THROUGH CERTIFICATES,
31 SERIES 2006-4F,

32 Plaintiff,

33 vs.

34 FIDELITY NATIONAL TITLE GROUP,
35 INC., et al.,

36 Defendants.

Case No.: 2:21-cv-00455-GMN-BNW

**STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT
CHICAGO TITLE INSURANCE
COMPANY'S TIME TO RESPOND
TO MOTION FOR REMAND [ECF
No. 10] AND MOTION FOR FEES
AND COSTS [ECF No. 11]**

(First Request)

1 Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff U.S. Bank
2 National Association (“U.S. Bank”) (collectively, the “Parties”), by and through their counsel of
3 record, hereby stipulate and agree as follows:

- 4 1. On March 18, 2021, U.S. Bank filed its Complaint in the Eighth Judicial District
5 Court, Case No. A-21-831364-C [ECF No. 1-1];
- 6 2. On March 18, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No.
7 1];
- 8 3. On April 19, 2021, U.S. Bank filed a Motion for Remand [ECF No. 10] and Motion
9 for Costs and Fees [ECF No. 11];
- 10 4. Chicago Title’s deadline to respond to U.S. Bank’s Motion for Remand and Motion
11 for Costs and Fees is May 3, 2021;
- 12 5. Chicago Title’s counsel is requesting an extension until June 4, 2021, to file its
13 response to the pending Motion for Remand and Motion for Costs and Fees;
- 14 6. Chicago Title requests a brief extension of time to respond to the Motion for Remand
15 and Motion for Costs and Fees to afford Chicago Title additional time to respond to
16 the legal arguments set forth in U.S. Bank’s motions;
- 17 7. U.S. Bank does not oppose the requested extension;
- 18 8. This is the first request for an extension which is made in good faith and not for
19 purposes of delay;

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1 **IT IS SO STIPULATED** that Chicago Title's deadline to respond to U.S. Bank's Motion
2 for Remand [ECF No. 10] and Motion for Costs and Fees [ECF No. 11] is hereby extended
3 through and including June 4, 2021.

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5 Dated: May 3, 2021

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

6
7 By: /s/-- Sophia S. Lau
8 SCOTT E. GIZER
9 SOPHIA S. LAU
Attorneys for Defendant CHICAGO TITLE
INSURANCE COMPANY

10 Dated: May 3, 2021

SINCLAIR BRAUN LLP

11 By: /s/-Kevin S. Sinclair
12 KEVIN S. SINCLAIR
13 Attorneys for Defendant CHICAGO TITLE
INSURANCE COMPANY

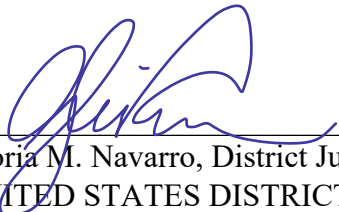
14 Dated: May 3, 2021

WRIGHT FINLAY & ZAK, LLP

15 By: /s/-Lindsay D. Robbins
16 DARREN T. BRENNER
17 LINDSAY D. ROBBINS
18 Attorneys for Plaintiff U.S. BANK
NATIONAL ASSOCIATION

19 **IT IS SO ORDERED.**

20 Dated this 3 day of May, 2021.

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22 
23 _____
24 Gloria M. Navarro, District Judge
25 UNITED STATES DISTRICT COURT
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1 **CERTIFICATE OF SERVICE**

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3 I hereby certify that on May 3, 2021, I electronically filed the foregoing with the Clerk of

4 the Court using the CM/ECF system which will send notification of such filing to the Electronic

5 Service List for this Case.

6 I declare under penalty of perjury under the laws of the United State of America that the

7 foregoing is true and correct.

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10 /s/ D'Metria Bolden

11 D'METRIA BOLDEN

12 An Employee of EARLY SULLIVAN

13 WRIGHT GIZER & McRAE LLP

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